

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

GREGORY THOMPSON	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b>CASE NO. 1:09-cv-1113-GBL/TRJ</b>
	)	
WACKENHUT SERVICES, INC.	)	
	)	
Defendant.	)	
	)	

---

**DEFENDANT'S MOTION TO COMPEL, OVERRULE PLAINTIFF'S  
OBJECTIONS TO DEFENDANT'S DISCOVERY REQUESTS AND EXTEND  
DEFENDANT'S DISCOVERY RELATED DEADLINES**

COMES NOW the Defendant, Wackenhut Services, Incorporated, by counsel, and moves of the Court for the entry of an order compelling the Plaintiff, Gregory Thompson, to provide full and complete and more specific responses to Defendant's First Set of Interrogatories and First Requests for Production of Documents, overruling all of Plaintiff's objections to Defendant's First Set of Interrogatories and First Requests for Production of Documents, and extending Defendant WSI's discovery deadlines, and as grounds therefor, incorporates the attached memorandum in support.

Respectfully submitted,

DOMBROFF GILMORE JAQUES & FRENCH

\_\_\_\_\_  
/s/  
Donald C. Weinberg, Esq. (VSB No. 17378)  
Darcy Cochran (VSB No. 76608)  
1676 International Drive  
Penthouse  
McLean, Virginia 22102  
Telephone (703) 336-8800  
Facsimile (703) 336-8750  
E-mail: [dweinberg@dglitigators.com](mailto:dweinberg@dglitigators.com)  
COUNSEL FOR DEFENDANT  
WACKENHUT SERVICES, INCORPORATED

CERTIFICATE OF SERVICE

I hereby certify that on the 21<sup>st</sup> day of May, 2010, I will electronically file the foregoing Motion to Compel, Overrule Plaintiff's Objections to Defendant's Discovery Requests and to Extend Defendant's Discovery Related Deadlines with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Angela Hope France, Esq.  
PCT Law Group, LLC  
1725 Duke Street  
Suite 240  
Alexandria, VA 22314  
Telephone: 703-881-9141  
Facsimile: 703-972-9153  
Co-counsel for Plaintiff  
Email: [afrance@pctlg.com](mailto:afrance@pctlg.com)

And I hereby certify that I will mail the document by U.S. mail to the following non-filing user:

Michael D.J. Eisenberg, Esq.  
700 12th St. NW, Ste. 700  
Washington, DC 20005  
Telephone: 202-558-6371  
Facsimile: 202-403-3430  
Counsel for Plaintiff  
Email: [michael@eisenberg-lawoffice.com](mailto:michael@eisenberg-lawoffice.com)

/s/

Donald C. Weinberg (VSB No. 17378)  
Darcy Cochran, Esq. (VSB No. 76608)  
1676 International Drive - Penthouse  
McLean, Virginia 22102  
Telephone (703) 336-8800  
Facsimile (703) 336-8750  
E-mail: [dweinberg@dglitigators.com](mailto:dweinberg@dglitigators.com)  
COUNSEL FOR DEFENDANT  
WACKENHUT SERVICES, INCORPORATED